



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

FEB 10 2014

**CERTIFIED MAIL 7009 1680 0000 7663 6360**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Ms. Rebecca Faas  
President  
INOV8 International, Inc.  
67 Kraft Street  
La Crosse, Wisconsin 54603

Re: Request for Information  
EPA ID No.: None

Dear Ms. Faas:

By this letter, the U. S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of the U.S. EPA to require you to submit certain information.

This request requires INOV8 International, Inc., (hereinafter "INOV8," "facility," or "you") to submit certain information relating to INOV8's waste management procedures. We are requiring this information to determine the facility's compliance status with the provisions of RCRA as delineated in the authorized Wisconsin Administrative Code (WAC), and the United States Code of Federal Regulations (C.F.R.); specifically, those regulations related to the generation, treatment, and storage of hazardous waste set forth in WAC s. NR 662.220 [40 C.F.R. § 261.5]. The enclosure specifies the information you must submit. You must submit this information within 30 calendar days of receiving this request to the U.S. EPA, Attention: Brenda Whitney, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 C.F.R. Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

INOV8 must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

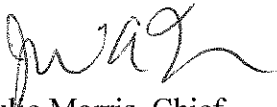


This request is not subject to the Paperwork Reduction Act, U.S.C. §§ 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject INOV8 to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Brenda Whitney at (312) 353-4796.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Julie Morris', with a stylized flourish at the end.

Julie Morris, Chief  
Compliance Section 2

Enclosure

cc: Scott Szymanski – WDNR ([Scott.Szymanski@Wisconsin.gov](mailto:Scott.Szymanski@Wisconsin.gov))

## **REQUEST FOR INFORMATION**

**Instructions:** You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

If information not known or not available to INOV8 as of the date of submission of its response should later become known or available to INOV8, then INOV8 must supplement its response to the EPA.

All terms used in this Request for Information shall have their ordinary meaning unless such terms are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.* and its implementing regulations.

### **Requests:**

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified, business telephone number for each individual identified, and the number of years that each identified individual has worked for or at INOV8.
2. Provide a comprehensive list of suppliers of non-vegetable-based oils. Differentiate each supplier into categories of "Household 'Do-It-Yourselfer' used oil generators" and Businesses.
3. For each Business identified in response to item 2, above, please provide all analytical test results showing that the used oil provided to or purchased by INOV8 from each Business identified does not exceed the levels shown below. See, WAC s. NR 679.11; Table 1 [40 CFR § 279.11, Table 1].

<b>Constituent/Property</b>	<b>Allowable Level</b>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Flash Point	100°F minimum
Total Halogens	4,000 ppm maximum

4. For each Business identified in response to item 2, above, whose oil has total halogens greater than 1,000 ppm, please provide information that rebuts the presumption that this oil had been mixed with a hazardous waste. See, WAC s. NR 679.10(2)(a) [40 CFR § 279.10(b)].

5. Please provide a written waste determination for your spent partswasher fluid with supporting documentation or analytical evidence that shows whether or not it is a hazardous waste prior to placement in an evaporator. See, WAC s. NR 662.011 [40 CFR § 262.11]
6. If available, please provide information demonstrating the length of time that the universal waste lamps observed at INOV8 during the EPA inspection on 11/20/13 were accumulating at your facility. If the accumulation time is or was greater than one year, INOV8 may choose to demonstrate that such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. See, WAC s. NR 673.15(1) and (2) [40 CFR § 273.15(a) and (b)].

**Certification:**

Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

